## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE CHATTANOOGA

SHANDLE MARIE RILEY,	§	
	§	
Plaintiff,	§	
	§	No. 1:19-cv-304
~V~	§	
	§	JURY DEMAND
HAMILTON COUNTY	§	
GOVERNMENT,	§	
	§	
DEPUTY DANIEL WILKEY,	§	
In his capacity as a deputy sheriff	§	
for Hamilton County Government and	§	
in his individual capacity,	§	
	§	
DEPUTY JACOB GOFORTH,	§	
In his capacity as a deputy sheriff	§	
for Hamilton County Government and	§	
in his individual capacity,	§	
	§	
Defendants.	§	

MOTION FOR ORDER REQUIRING DEFENDANT HAMILTON COUNTY
GOVERNMENT TO PRESERVE ELECTRONIC EVIDENCE AND DATA AND FOR
AN ORDER ALLOWING THE PLAINTIFF TO CONDUCT A FORENSIC
EXAMINATION OF ALL COMPUTERS AND DATA PRESERVING DEVICES
INVOLVED IN ANY WAY WITH THE TRANSMISSION AND PRESERVATION OF
IN-CAR VIDEO CREATED BY HAMILTON COUNTY DEPUTIES AND OTHER LAW
ENFORCEMENT PERSONNEL OF HAMILTON COUNTY GOVERNMENT

PLAINTIFF, through counsel, pursuant to Fed. R. Civ. P., Rule 37, moves this Court for an Order that would require Defendant Hamilton County Government ("County") to preserve all electronic data and the devices that the County used to obtain, gather, store, and disseminate audio and video, including, but not limited to computers, servers, and recording devices of any nature used by the County's law enforcement personnel.

In support of this motion, Plaintiff relies upon her Memorandum of Law filed contemporaneously with this Motion.

Respectfully submitted,

By: s/ Robin Ruben Flores

ROBIN RUBEN FLORES TENN. BPR #20751 GA. STATE BAR #200745

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## CERTIFICATE OF SERVICE

I certify that I have delivered a copy of this motion to all persons noted on the electronic filing receipt and so delivered on the date and time shown on the same receipt.

By: s/ Robin Ruben Flores